

**Alabama Workforce Investment System**

**Alabama Department of Economic and Community Affairs  
Workforce Development Division  
401 Adams Avenue  
Post Office Box 5690  
Montgomery, Alabama 36103-5690**

November 5, 2003

**GOVERNOR'S WORKFORCE DEVELOPMENT DIRECTIVE NO. PY2003- 10**

**SUBJECT:** Federal Register/Local Area Survey on the WIA Performance Measurement System

1. **Purpose.** This transmits notice of an opportunity provided the general public and Federal agencies to comment upon a proposed survey to collect data on performance accountability and measurement systems.
2. **Discussion.** The October 30, 2003, **Federal Register** indicates that the Employment and Training Administration is soliciting comments concerning proposed data collection methods for local workforce investment area (LWIA) performance accountability and measurement systems.

A copy of the proposed survey instrument is attached to this Directive. Note that any comments regarding this instrument must be received at USDOL by December 29, 2003.

\_\_\_\_\_ Copies of this **Federal Register** notice are provided for informational and action purposes.

4. **Contact.** Questions regarding this information may be referred to Alberta Baker, USDOL, at (202) 693-3642.

  
Steve Walkley, Division Director

Attachment

- Evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;
- Enhance the quality, utility, and clarity of the information to be collected; and
- Minimize the burden of the collection of information on those who are to respond, including through the

use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

*Agency:* Bureau of Labor Statistics.

*Type of Review:* Revision of a currently approved collection.

*Title:* The Consumer Expenditure Surveys: The Quarterly Interview and the Diary.

*OMB Number:* 1220-0050.

*Affected Public:* Individuals or households.

*Type of Response:* Recordkeeping and Reporting.

*Frequency:* Quarterly; Weekly; and Annually.

*Number of Respondents:* 17,374.

Information collection	Annual responses	Average response time (hours)	Annual burden hours
CE Quarterly Interview CAPI Instrument .....	38,516	1.5	57,774
Quarterly Interview Re-interview .....	2,118	0.25	530
CD Diary: CE-801, Record of Daily Expenses .....	15,490	1.75	27,108
CE Diary: CE-802 Household Questionnaire .....	23,235	0.42	9,681
CE Diary Re-interview, CE-880, CE-880(N) .....	1,293	0.20	259
Totals .....	80,652	.....	95,352

*Total Annualized Capital/Startup Costs:* \$0.

*Total Annual Costs (operating/maintaining systems or purchasing services):* \$0.

*Description:* The Consumer Expenditure Surveys are used to gather information on expenditures, income, and other related subjects. These data are used to periodically update the national Consumer Price Index. In addition the data are used by a variety of researchers in academia, government agencies, and the private sector. The data are collected from a national probability sample of households designed to represent the total civilian non-institutional population.

**Ira L. Mills,**

*Departmental Clearance Officer.*

[FR Doc. 03-27354 Filed 10-29-03; 8:45 am]

**BILLING CODE 4510-24-M**

## DEPARTMENT OF LABOR

### Employment and Training Administration

#### Proposed Data Collection Submitted for Public Comment and Recommendation; Local Area Survey of the WIA Performance Measurement System

**ACTION:** Notice.

**SUMMARY:** The Department of Labor, as part of its continuing effort to reduce paperwork and respondent burden, is conducting a preclearance consultation program to provide the general public and Federal agencies with an opportunity to comment on proposed collections of information in accordance

with the Paperwork Reduction Act of 1995 (44 U.S.C. 3506(c)(2)(A)). This program helps to ensure that requested data can be provided in the desired format, reporting burden (time and financial resources) is minimized, collection instruments are clearly understood, and the impact of the collection requirements on respondents can be properly assessed. Through this notice, the Employment and Training Administration is soliciting comments concerning a proposed new collection of data on performance accountability and measurement policies and practices employed by local workforce investment areas (LWIA) under the Workforce Investment Act (WIA).

A copy of the proposed survey can be obtained by contacting the office listed below in the **ADDRESSES** section of this notice.

**DATES:** Written comments must be submitted to the office listed in the **ADDRESSES** section below on or before December 29, 2003.

**ADDRESSES:** Alberta Baker, U.S. Department of Labor, Employment and Training Administration, Office of Policy Development, Evaluation and Research, 200 Constitution Avenue, NW., Room N-5637, Washington DC 20210, (202) 693-3642.

**FOR FURTHER INFORMATION CONTACT:** Alberta Baker (202) 693-3642.

**SUPPLEMENTARY INFORMATION:**

#### I. Background

The Department of Labor, Employment and Training Administration seeks to gather information about the performance accountability and measurement system and how this system impacts specific

local area policies, practices, and service delivery under WIA. This survey will enable ETA to collect uniform data across all Local Workforce Investment Areas providing DOL with a snapshot of the performance accountability and measurement system as a whole and, in addition, pointing to areas of potential concern and areas of strength within this system. The data will provide information on local policies and procedures related to performance accountability including the goals established for local areas, the management tools and practices local areas have put in place to help meet these goals, the influence of broader performance measurement system on local service delivery design, and local areas' awareness and assessment of Common Measures, which are to be implemented in all job training and employment programs in 2004.

Performance accountability and measurement have been important features of the nation's workforce investment system. The Workforce Investment Act (WIA) establishes a performance accountability system, the explicit purpose of which (Sec. 136(a)) is "to assess the effectiveness of States and local areas in achieving continuous improvement of workforce investment activities funded under this subtitle." DOL negotiates goals for performance outcomes with each state, and states, in turn, negotiate with their local areas to set local goals. Beyond negotiated performance levels, states can give local areas substantial discretion in designing a system to deliver workforce services. The combination of individually negotiated performance levels and local design discretion suggests there will be

extensive variation among local workforce investment areas regarding policies and practices related to performance measurement and management. This data collection effort will enable DOL to identify the varying approaches and create a national picture of the ways in which this performance measurement system impacts policies and services at the local level.

Further, enormous amounts of resources have been expended in developing the infrastructure required to effectively measure and manage performance. Major investments have been made in MIS systems and in training employees on effective management strategies to meet negotiated levels. However, little is known about exactly what practices local areas are employing to meet measures, how the broad measures in place are impacting local decisions on managing performance, or whether local areas have implemented additional measures that better enable them to monitor and improve their performance. The data collected will enable ETA to fill this information gap and gain a better understanding of how the performance accountability system is actually operating, as well as any areas of concern that arise from the planned implementation of Common Measures in 2004.

## II. Review Focus

The Department of Labor is particularly interested in comments that: (a) Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information has practical utility; (b) evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information; (c) enhance the utility, quality and clarity of the information to be collected; and (d) minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

## III. Current Actions

The Department of Labor's Employment and Training Administration will be seeking Office of Management and Budget (OMB) approval to administer a questionnaire to LWIAs on policies and practices related to performance accountability, including their performance goals, and measures and tools they have established to assist in performance management. The data will be used in

two ways: to provide a national snapshot of the performance measurement system and to discern patterns of performance policies and practices among LWIAs.

**Agency:** Department of Labor Employment and Training Administration.

**Type of Review:** New.

**Title:** Local Area Survey of the WIA Performance Measurement System.

**Affected Public:** Local Workforce Investment Areas.

**Total Respondents:** 605.

**Frequency:** Once.

**Total Responses:** 605.

**Average Time Per Response:** One hour.

**Estimated Total Burden Hours:** 605 hours.

**Total Burden Cost for Capital and Startup:** \$0.

**Total Burden Cost for Operation and Maintenance:** \$0.

Comments submitted in response to this comment request will be summarized and/or included in the request for OMB approval of the information collection request; they will also become a matter of public record.

Dated: October 23, 2003.

**Emily Stover DeRocco,**

*Assistant Secretary for Employment and Training.*

[FR Doc. 03-27355 Filed 10-29-03; 8:45 am]

**BILLING CODE 4510-30-P**

## NATIONAL FOUNDATION ON THE ARTS AND THE HUMANITIES

### National Endowment for the Arts; Combined Arts Advisory Panel

Pursuant to section 10(a)(2) of the Federal Advisory Committee Act (Pub. L. 92-463), as amended, notice is hereby given that six meetings of the Combined Arts Advisory Panel to the National Council on the Arts will be held at the Nancy Hanks Center, 1100 Pennsylvania Avenue, NW., Washington, DC 20506 as follows:

**Music:** November 17-18, 2003, Room 714 (Heritage and Preservation category, Panel A). This meeting will be closed.

**Music:** November 18, 2003, Room 714 (Challenge America-Access category, Panel A). A portion of this meeting, from 3:30 p.m. to 4:30 p.m., will be open to the public for policy discussion. The remaining portions of this meeting, from 10:30 a.m. to 3:30 p.m. and from 4:30 p.m. to 5 p.m., will be closed.

**Folk & Traditional Arts:** November 18-21, 2003, Room 716 (Challenge America-Access and Heritage and Preservation categories). A portion of this meeting, from 11 a.m. to 12:30 p.m. on November 21st, will be open to the public for policy discussion. The remaining portions of this meeting, from 9 a.m. to 6:30

p.m. on November 18th-20th, and from 9 a.m. to 11 a.m. and 12:30 p.m. to 4:30 p.m. on November 21st, will be closed.

**Music:** November 19-21, 2003, Room 714 (Challenge America-Access category, Panel B). This meeting will be closed.

**Music:** November 21, 2003, Room 714 (Heritage and Preservation category, Panel B). A portion of this meeting, from 4 p.m. to 5 p.m., will be open to the public for policy discussion. The remaining portions of this meeting, from 2:30 p.m. to 4 p.m. and from 5 p.m. to 5:30 p.m., will be closed.

**Museums:** December 2-4, 2003, Room 716 (Challenge America-Access and Heritage and Preservation categories). This meeting will be closed.

The closed meetings and portions of meetings are for the purpose of Panel review, discussion, evaluation, and recommendation on applications for financial assistance under the National Foundation on the Arts and the Humanities Act of 1965, as amended, including information given in confidence to the agency by grant applicants. In accordance with the determination of the Chairman of April 30, 2003, these sessions will be closed to the public pursuant to subsection (c) (6) of 5 U.S.C. 552b.

Any person may observe meetings, or portions thereof, of advisory panels that are open to the public, and, if time allows, may be permitted to participate in the panel's discussions at the discretion of the panel chairman and with the approval of the full-time Federal employee in attendance.

If you need special accommodations due to a disability, please contact the Office of AccessAbility, National Endowment for the Arts, 1100 Pennsylvania Avenue, NW., Washington, DC 20506, 202/682-5532, TDY-TDD 202/682-5496, at least seven (7) days prior to the meeting.

Further information with reference to this meeting can be obtained from Ms. Kathy Plowitz-Worden, Office of Guidelines & Panel Operations, National Endowment for the Arts, Washington, DC 20506, or call 202/682-5691.

Dated: October 24, 2003.

**Kathy Plowitz-Worden,**

*Panel Coordinator, Panel Operations, National Endowment for the Arts.*

[FR Doc. 03-27301 Filed 10-29-03; 8:45 am]

**BILLING CODE 7537-01-P**

## NATIONAL SCIENCE FOUNDATION

### Sunshine Act Meeting

**AGENCY HOLDING MEETING:** National Science Foundation, National Science Board, Committee on Strategy and Budget.

**DATE AND TIME:** November 7, 2003, 2:30 p.m.-3:30 p.m., Open Session.

**PLACE:** The National Science Foundation, Stafford One Building, 4201 Wilson Boulevard, Room 130, Arlington, VA 22230.

**STATUS:** This meeting will be open to the public.

OMB Control No. 1205-XXXX

Expiration date: xx/xx/xxxx

**Local Area Survey**  
**WIA Performance Measurement System**

These reporting requirements are approved under the Paperwork Reduction Act of 1995, OMB Control No. 1205-XXXX, expiring zz/zz/zzzz. Persons are not required to respond to this collection of information unless it displays a currently valid OMB number. Public reporting burden for this collection of information is estimated to average \_\_\_\_ minutes/hours per response, including the time for reviewing instructions, searching existing data sources, gathering and reviewing the collection of information. Respondent's obligation to reply is voluntary. Send comments regarding this burden estimate or any other aspect of this collection, including suggestions for reducing this burden U.S. Department of Labor, Office of \_\_\_\_\_, Room \_\_\_\_\_, Washington, D.C. 20210 (Paperwork Reduction Project 1205-XXXX).

**Local Area Survey**  
**WIA Performance Measurement System**

Local Area Name:

Key Contact Person:

Telephone Number:

Email Address:

Other Respondents:

**PERFORMANCE LEVEL NEGOTIATIONS WITH THE STATE**

1. How would you characterize your LWIA's negotiation process with the state? (CIRCLE ONE RESPONSE)
  - 1 No negotiation
  - 2 Minor negotiation
  - 3 Substantial negotiation
  
2. Which of the following was explicitly considered during your local area's negotiation process with the state? (CIRCLE ALL THAT APPLY)
  - 1 Local economic conditions
  - 2 Characteristics of participants
  - 3 Services that your local area provides
  - 4 JTPA or other historical data
  - 5 Statewide levels negotiated with federal DOL
  - 6 Other, please list: \_\_\_\_\_
  - 9 None of the above
  
3. How much consideration did the state give to issues and concerns raised by local representatives during the negotiation process? (CIRCLE ONE RESPONSE)
  - 1 No consideration
  - 2 Some consideration, but not enough
  - 3 Adequate consideration

4. To what extent did negotiations with the state result in adjustments to the performance levels initially perceived by the state to be appropriate?  
(CIRCLE ONE RESPONSE)

0 No adjustments at all ⇒ [Skip to question 6]  
1 Slight adjustments  
2 Significant adjustments

5. Did these adjustments increase or decrease your expected performance levels? (CIRCLE ONE RESPONSE)

1 Increased  
2 Decreased

6. How fair do you feel that the negotiated levels are? (CIRCLE ONE RESPONSE)

1 Not fair at all  
2 Somewhat fair  
3 Absolutely Fair

7. How do your local area's required performance levels under WIA compare to the expectations for performance under the Job Training Partnership Act (JTPA)? (CIRCLE ONE RESPONSE)

1 Far less is expected under WIA  
2 Somewhat less is expected under WIA  
3 About the same is expected under WIA  
4 Somewhat more is expected under WIA  
5 Far more is expected under WIA  
9 Don't Know

8. Has the LWIB obtained any revisions to negotiated performance levels?  
(CIRCLE ONE RESPONSE)

1 Yes  
2 No

#### **LOCAL PERFORMANCE MEASUREMENT SYSTEM**

9. Does your local area utilize supplemental data sources (i.e., in addition to UI wage matching) for measurement of employment or retention outcomes?

1 Yes, please list which sources are used:

2 No ⇒ [Skip to question 11]

10. How do these supplemental data impact the measured employment and retention outcomes? (CIRCLE ONE RESPONSE)

- 1 Substantially impact the outcomes
- 2 Only slightly impact the outcomes
- 3 No impact at all on the outcomes

11. How important is it to your local area that you *exceed* rather than just meet your performance standards? (CIRCLE ONE RESPONSE)

- 1 Not at all important
- 2 Somewhat important
- 3 Extremely important

12. Does the performance measurement system have an impact on the emphasis you place on core versus intensive versus training services? (CIRCLE ONE RESPONSE)

- 1 No impact ⇒ [Skip to question 14]
- 2 Some impact
- 3 Substantial impact

13. How does the performance measurement system impact the emphasis you place on the following types of services? (CIRCLE ONE RESPONSE)

Type of Service	Place Less Emphasis on these Services	Place More Emphasis on these Services
a. Core	1	2
b. Intensive	1	2
c. Training	1	2

14. Please rate the emphasis you place on the following performance measures on a scale of 1 to 5, with 1 being very little emphasis and 5 being very strong emphasis.

Please rate the emphasis you place on the following performance measures	Very Little Emphasi				Very Strong Emphasi
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	s				s
<b>Adults:</b>					
a. Entered Employment Rate	1	2	3	4	5
b. Employment Retention Rate	1	2	3	4	5
c. Earnings Change	1	2	3	4	5
d. Employment and Credential Rate	1	2	3	4	5
<b>Dislocated Workers:</b>					
e. Entered Employment Rate	1	2	3	4	5
f. Employment Retention Rate	1	2	3	4	5
g. Earnings Replacement Rate	1	2	3	4	5
h. Employment and Credential Rate	1	2	3	4	5
<b>Older Youth:</b>					
i. Entered Employment Rate	1	2	3	4	5
j. Employment Retention Rate	1	2	3	4	5
k. Earnings Change	1	2	3	4	5
l. Credential Rate	1	2	3	4	5
<b>Younger Youth:</b>					
m. Diploma Attainment Rate	1	2	3	4	5
n. Retention Rate	1	2	3	4	5
o. Goal Attainment Rate	1	2	3	4	5
<b>Customer Satisfaction:</b>					
p. Participant Customer Satisfaction	1	2	3	4	5
q. Employer Customer Satisfaction	1	2	3	4	5

#### COMMON MEASURES

15. Are you aware of the Common Performance Measures that are to be implemented for PY 2004 for all job training and employment programs (including WIA)? (CIRCLE ONE RESPONSE)

1 Yes

2 No ⇒ [Skip to Question 22]

16. How different do you think each of the following Common Measures are from the current adult and youth measures? (CIRCLE ONE RESPONSE FOR EACH ROW)



	<b>Very Similar</b>	<b>Somewhat Similar</b>	<b>Very Different</b>
<b>Adults:</b>			
a. Entered Employment	1	2	3
b. Retention	1	2	3
c. Earnings Increase	1	2	3
d. Efficiency	1	2	3
<b>Youth:</b>			
e. Placement in Employment/Education	1	2	3
f. Attainment of Degree/Certificate	1	2	3
g. Literacy/Numeracy Gains	1	2	3
h. Efficiency	1	2	3

17. How easy do you think it will be to implement the following Common Measures? (CIRCLE ONE RESPONSE FOR EACH ROW)

	<b>Very Easy</b>	<b>Somewhat Easy</b>	<b>Very Difficult</b>
<b>Adults:</b>			
a. Entered Employment	1	2	3
b. Retention	1	2	3
c. Earnings Increase	1	2	3
d. Efficiency	1	2	3
<b>Youth:</b>			
e. Placement in Employment/Education	1	2	3
f. Attainment of Degree/Certificate	1	2	3
g. Literacy/Numeracy Gains	1	2	3
h. Efficiency	1	2	5

18. If you responded that any of the Common Measures would be difficult to implement, please describe why you feel this way.

19. As you may know, the efficiency measures are an indicator of the appropriation level divided by the number of participants served with these funds. Do you have concerns about the implementation of such measures?

1 Yes, please describe your concerns:

2 No

20. Do you feel you will need Technical Assistance in the implementation of any of the following Common Measures? (CIRCLE ALL THAT APPLY)

**Adult Measures:**

- 1 Entered Employment
- 2 Retention
- 3 Earnings Increase
- 4 Efficiency

**Youth/Lifelong Learning Measures:**

- 5 Placement in Employment/Education
- 6 Attainment of Degree/Certificate
- 7 Literacy/Numeracy Gains
- 8 Efficiency

21. Will implementation of these measures have a significant impact on your program design and operation? (CIRCLE ONE RESPONSE)

- 1 No or very minimal impact
- 2 Somewhat of an impact
- 3 Substantial impact

22. Please describe any concerns you have about the implementation of the Common Measures?

**TECHNICAL ASSISTANCE AND WAYS TO ADDRESS PERFORMANCE**

23. Has the state provided technical assistance to the local area on how to meet performance standards? (CIRCLE ONE RESPONSE)

- 1 Yes
- 2 No ⇒ [Skip to Question 27]

24. Which performance measures did the technical assistance address?

25. In what format was the technical assistance provided? (CIRCLE ONE RESPONSE)

- 1 Written guidance
- 2 Targeted phone assistance
- 3 Technical training session

26. What was the basis of the technical assistance? (CIRCLE ONE RESPONSE)

- 1 Failure on 1 or more standards
- 4 State concern about potential failure on standards
- 5 Local request
- 6 Generalized assistance concerning performance measures
- 7 Other, please describe: \_\_\_\_\_

27. Does your state provide local areas incentives for performance under WIA? (CIRCLE ONE RESPONSE)

- 1 Yes
- 2 No ⇒ **[Skip to Question 30]**

28. Has the possibility of receiving any incentives had an impact on the following: (CIRCLE ALL THAT APPLY)

- 1 The types of services you offer
- 2 The number of services you provide to participants
- 3 The types of individuals you target for your services
- 4 The types of participants who are registered into WIA
- 5 The training or other service providers your customers can use
- 8 Other, please describe: \_\_\_\_\_

29. Has your local area received any incentives/rewards because of your performance measures? (CIRCLE ONE RESPONSE)

- 1 Yes, please describe the incentive:  
\_\_\_\_\_
- 2 No

30. Does your state impose sanctions or other corrective action for failure to meet performance standards under WIA? (CIRCLE ONE RESPONSE)

1 Yes

2 No ⇒ [Skip to Question 34]

31. Has the possibility of receiving any sanctions had an impact on the following: (CIRCLE ALL THAT APPLY)

1 The types of services you offer

2 The number of services you provide to participants

3 The types of individuals you target for your services

4 The types of participants who are registered into WIA

5 The training or other service providers your customers can use

6 Other, please describe: \_\_\_\_\_

32. Has your local area received any sanctions or corrective actions as a result of your performance measures? (CIRCLE ONE RESPONSE)

1 Yes, please describe the sanction:

\_\_\_\_\_

2 No

33. Does the state consider mitigating circumstances in connection with sanctions? (CIRCLE ONE RESPONSE)

1 Yes

2 No

9 Don't Know

34. Are there other ways (besides incentives and sanctions) that the state addresses performance issues with your local area? (CIRCLE ONE RESPONSE)

1 Yes, please describe:

2 No

## TARGETING AND SERVICES

**In this section, please respond as accurately as you can. In some cases your response may be based on a statewide policy and in other cases it may be based on policy unique to your own local area.**

35. Does your local area target particular groups for service under WIA?

- 1 Yes
- 2 No ⇒ [Skip to Question 41]

36. Is this targeting part of a published local or state plan?

- 1 Yes
- 2 No

37. Are there measurable goals for this targeting?

- 1 Yes
- 2 No

38. Do you have policies that give priority to the following groups ?

<b>Group:</b>	<b>Yes</b>	<b>No</b>
a. Individuals with low or no prior earnings (such as TANF clients)	1	2
b. Adults with multiple barriers to success	1	2
c. Individuals with disabilities	1	2
d. In-school Youth	1	2
e. Out-of-School Youth	1	2
f. Homeless Youth	1	2

39. To what extent do performance measures influence targeting?

- 0 Not at all ⇒ [Skip to Question 42]
- 1 Somewhat

- 2 Substantially
- 3 Targeting is entirely determined by performance measures

40. How have performance measures influenced your targeting of the following groups? (CIRCLE ONE RESPONSE FOR EACH ROW)

	No Influenc e	Targeted this group less	Targeted this group more
a. Adults/ dislocated workers with high prior earnings	0	1	2
b. Adults/ dislocated workers with extensive work histories	0	1	2
c. Individuals with low or no prior earnings (such as TANF clients)	0	1	2
d. Adults with multiple barriers to success	0	1	2
e. Individuals with disabilities	0	1	2
f. In-school Youth	0	1	2
g. Out-of-School Youth	0	1	2
h. Homeless Youth	0	1	2

41. To what extent has the performance measurement system had an influence on services provided by the One-Stop?

- 0 No influence ⇒ **[Skip to Question 43]**
- 1 Somewhat of an influence
- 2 Substantial influence

42. Has this effect been to expand or limit the number of services provided by the One-Stop? (CIRCLE ONE RESPONSE)

- 1 Expand
- 2 Limit

43. To what extent has the performance measurement system had influence on services that providers deliver? (CIRCLE ONE RESPONSE)

- 0 No influence ⇒ **[Skip to Question 45]**

- 1 Somewhat of an influence
- 2 Substantial influence

44. Has the impact been to expand or limit services that providers deliver?

- 1 Expand
- 2 Limit

45. Do performance measures influence decisions about when an individual is eligible to register for WIA ? (CIRCLE ONE RESPONSE)

1 Yes, please describe how:

2 No

46. Are there specific rules about when an individual must be registered under WIA? (CIRCLE ONE RESPONSE)

1 Yes

2 No ⇒ **[Skip to Question 48]**

47. Please describe these rules.

48. Do performance measures influence decisions about an individual's exit point from WIA ? (CIRCLE ONE RESPONSE)

1 Yes, please describe how:

2 No

## **COSTS**

49. Does the performance measurement system have any impact on costs of operating your local area's WIA programs?

- 1 Yes
- 2 No ⇒ [Skip to Question 51]

50. In what way does the performance measurement system impact costs?

51. What were the total operating costs of your *adult* program in the most recently completed program year?

\$ \_\_\_\_\_

52. What were the total operating costs of your *youth* program in the most recently completed program year?

\$ \_\_\_\_\_

53. What were the total operating costs of your *dislocated worker* program in the most recently completed program year?

\$ \_\_\_\_\_

## **IMPACT ON PROVIDERS**

54. To what extent do performance measures influence your decisions about which service providers to utilize? (CIRCLE ONE RESPONSE)

- 0 No influence at all
- 1 Slight influence
- 2 Substantial influence
- 3 Completely determine which providers are eligible

55. Do you offer incentives to providers for performance?

- 1 Yes, please describe these incentives:



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2 No

56. Do you impose sanctions/corrective action for failure to meet standards?

1 Yes, please describe these sanctions:

---

2 No

57. Do your providers have performance measures for other non-WIA programs that they are operating? (CIRCLE ONE RESPONSE)

1 Yes, they are exactly the same measures as WIA

2 Yes, they have similar measures to those used in WIA

3 Yes, but they are not similar to the WIA measures at all

4 No, they do not have performance measures outside of WIA

9 Don't know

58. Does your local area place greater emphasis on using Individual Training Accounts (ITAs) or on using contract providers for adult and dislocated worker services?

1 Much more emphasis on ITAs

2 Somewhat more emphasis on ITAs

3 Equal emphasis on ITAs and contract providers

4 Somewhat more emphasis on contract providers

5 Much more emphasis on contract providers

59. How are performance requirements for eligible training providers established? (CIRCLE ONE RESPONSE)

1 By the state alone⇒ **[Skip to Question 61]**

3 By the state, but local areas may set higher standards

4 By local areas because the state sets minimum standards

5 Other, please describe: \_\_\_\_\_

60. Does your local area require higher performance for training providers to be eligible than those requirements outlined by the state?

- 1 Yes
- 2 No

61. Do you require training provider applicants to submit historical performance information? (CIRCLE ONE RESPONSE)

- 1 Yes
- 2 No
- 3 No, but applicants have the option to use historical data

62. What percentage of providers that applied met required eligibility requirements in the last eligibility cycle (if approvals are done at one time) or in the last year (if approvals occur on a rolling basis)?

\_\_\_\_\_ %

63. Do you require eligible training providers to meet the same performance levels for their WIA students that the LWIB is required to meet for all participants?

- 1 The same are required of providers
- 2 Higher standards are required of providers
- 3 Lower standards are required of providers
- 4 Varies depending on population served
- 5 Varies by the particular measure

64. To what extent do you think the performance accountability system discourages providers from applying for eligibility?

- 1 Does not discourage providers from applying
- 2 Discourages a few providers
- 3 Discourages numerous providers

65. Are there sufficient numbers of providers *for adult services* in your area that meet eligibility requirements and are willing to provide the services your customers need?

- 1 Yes
- 2 No, please explain:

66. Are performance requirements established explicitly in your contracts with youth providers? (CIRCLE ONE RESPONSE)

- 1 Yes
- 2 No ⇒ [Skip to Question 68]

67. Does your local area require higher or lower performance for youth providers than the local area-wide requirements?

- 1 Set performance requirements lower
- 2 Require performance identical to local area standards
- 3 Set performance requirements lower
- 4 Performance requirements depend on the program

68. Do you require youth providers to submit historical performance information in their proposals? (CIRCLE ONE RESPONSE)

- 1 Yes
- 2 No

69. To what extent do you think the performance accountability system discourages youth providers from submitting proposals?

- 1 Does not discourage providers from applying
- 2 Discourages a few providers
- 3 Discourages numerous providers

70. Are there sufficient numbers of providers *for youth services* in your area that meet eligibility requirements and are willing to provide the services your customers need?

- 1 Yes
- 2 No, please explain:

71. Have you contracted with the following types of agencies to provide youth services? If yes, with how many of this type of agency have you contracted to provide youth services, and approximately how many WIA participants are served by these types of agencies?

				# of WIA
--	--	--	--	----------

Type of Provider	No	Yes	# of Contracts	Participants Served by Agency
a. Public schools?	1	2		
b. Faith- or Community-based organizations?	1	2		
c. For-profit providers?	1	2		
d. Other (list):	1	2		

### IMPACT ON PARTNERS

72. Are *core* services in your local area provided by the Employment Service (ES) or by WIA?

- 1 Exclusively provided by ES
- 2 Primarily provided by ES
- 3 Provided Equally by ES and WIA
- 4 Primarily provided by WIA
- 5 Exclusively provided by WIA
- 6 Provided by other partner; please list:

73. Are *intensive* services in your local area provided by ES or by WIA?

- 1 Exclusively provided by ES
- 2 Primarily provided by ES
- 3 Provided Equally by ES and WIA
- 4 Primarily provided by WIA
- 5 Exclusively provided by WIA
- 6 Provided by other partner; please list:

74. To what extent is there co-enrollment between ES and WIA?

- 1 No co-enrollment
- 2 Very little co-enrollment
- 3 Substantial co-enrollment

75. Do any of the One-Stop partners have similar performance measures as those specified in WIA?

- 1 Yes, *many* have the same measures
- 2 Yes, a *few* have the same measures
- 3 No, none have the same measures

76. To what extent do the performance measures influence willingness to co-enroll clients?

- 0 Not at all
- 1 Somewhat *reduces* willingness to co-enroll
- 2 Substantially *reduces* willingness to co-enroll
- 3 Somewhat *increases* willingness to co-enroll
- 4 Substantially *increases* willingness to co-enroll

77. To what extent do performance measures influence partners' willingness to become an active partner in the One-Stop?

- 0 Not at all
- 1 Somewhat *reduces* willingness to become a One-Stop partner
- 2 Substantially *reduces* willingness to become a One-Stop partner
- 3 Somewhat *increases* willingness to become a One-Stop partner
- 4 Substantially *increases* willingness to become a One-Stop partner
- 9 Don't know

#### **PROGRAM MANAGEMENT AND IMPROVEMENT**

78. Has your local area set up an explicit continuous improvement program?

- 1 Yes, please describe:
- 2 No

79. Are WIA performance measures used to assess continuous improvement?

- 1 Yes
- 2 No, Why not:

80. Are WIA performance measures helpful in managing the day-to-day functioning of programs?

- 1 Yes, please describe how:
- 2 No, Why not?

81. How central are WIA performance measures to the success of your overall program management and improvement efforts?

- 0 Not at all
- 1 Very little
- 2 Somewhat
- 3 A great deal

82. Does your local area utilize other measures of program performance for management purposes?

- 1 Yes, Which measures?
- 2 No

83. Has the performance measurement system been helpful in any efforts to improve program quality?

- 0 Not at all
- 1 Very little
- 2 Somewhat
- 3 A great deal

84. Have there been any unanticipated negative impacts to implementation of the performance measurement system?

1 Yes, please explain:

2 No

85. Have there been unanticipated benefits to the performance measurement system?

1 Yes, please explain:

2 No

86. Have there been major changes in your local economy that have impacted the labor market and consequently services solicited under WIA?

1 Yes, please describe:

2 No

#### **ALTERNATIVE MEASURES**

87. Has your local area adopted other performance measures to obtain additional information not captured by the current performance measurement system?

1 Yes

2 No ⇒ [Skip to End]

88. Please describe the other measures you have adopted to help you obtain this additional performance information.

**END.** Thank you for completing this survey. Your participation is very important in helping us to understand how the performance measurement system impacts customers and services under WIA.

**Please return this completed survey in the postage-paid envelope to:**

**Social Policy Research Associates  
1330 Broadway, Suite 1426  
Oakland, CA 94612**



**SUPPORTING STATEMENT FOR  
PAPERWORK REDUCTION ACT 1995 SUBMISSION:  
Evaluation of the WIA Performance Measurement System**

The US Department of Labor's Employment and Training Administration is seeking Office of Management and Budget (OMB) approval to collect data from local workforce investment areas (LWIAs) on policies and practices related to the performance measurement and accountability system established under the Workforce Investment Act (WIA). The primary goal of the data collection is to provide a national snapshot of the performance measurement system currently in place. The data will provide information on local policies and procedures related to performance accountability including the goals established for local areas, the management tools and practices local areas have put into place to help meet these goals and the influence of the broader performance measurement system on local service delivery design. Additionally, these data will gauge local areas' awareness and assessment of Common Measures that are to be implemented in 2004.

Performance accountability and measurement have long been important features of the nation's workforce development system. The Workforce Investment Act (WIA) establishes a performance accountability system whose explicit purpose (Sec. 136(a)) is "to assess the effectiveness of States and local areas in achieving continuous improvement of workforce investment activities funded under this subtitle." Under WIA, goals are negotiated first between DOL and the state, and subsequently, between states and their LWIAs, thus creating substantial variation in the targeted performance levels. In addition to negotiating performance goals, states can give local areas substantial discretion in designing systems to deliver workforce services. Given this discretion, and their specific performance goals, local areas must enact policies and procedures in an effort to meet these goals and effectively serve their clients. Further, the increased emphasis that WIA places on awards and sanctions (as compared to JTPA) deepens the implications of local decisions regarding performance practice and policy. Documenting how the measures in place impact decisions about these policies and procedures is fundamental to constructing an accurate picture of the consequences of the current performance system. Providing a summary of the consequences, both intended and unintended, is critical to ensuring that the performance accountability system supports the goals of WIA and contributes to effective performance system wide.

Although the current system is intended to further the goals of WIA and has been designed to enable local areas and states to document their achievements, because of the substantial variation between local areas, little is known about the specific policies in place. This data collection effort is intended to fill this information gap and to provide both DOL and the workforce system with valuable information about how the performance accountability system impacts local areas' policies, practices, and service delivery. Additionally, this data collection will inform DOL about local areas' awareness and assessment of the Common Measures, which are to be implemented for all job training and employment programs in 2004. Such data will thus enable DOL to identify any areas of concern and target technical assistance to those areas most in need of such assistance as they implement these Common Measures.

## **A. Justification**

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The Workforce Investment Act establishes a performance accountability system “to assess the effectiveness of States and local areas in achieving continuous improvement of workforce investment activities”. Substantial resources have been expended in developing the infrastructure required to effectively measure and manage performance. Major investments have been made in MIS systems and in training employees on effective management strategies to meet the measures. However, little is known about exactly what measures are in place, what practices local areas are employing to meet measures and how the broad measures are impacting specific local decisions about managing performance and delivering services. Because measures are negotiated at the state level and renegotiated at the local level, little is known about actual policies and procedures being employed for performance accountability and management, nor about whether the system is encouraging its intended consequences adequately and discouraging any unintended consequences.

The proposed local-area survey is part of a broader effort to answer these questions. Because each LWIA has its own negotiated performance goals and at least some discretion as to its service delivery design, we must collect data from each local site in order to create a comprehensive, national snapshot of the performance measurement system and its impacts on the broader workforce system. A copy of the local-area survey is included as Appendix A.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

This is a new collection. ETA has selected a contractor to administer surveys to Local Workforce Investment Areas for their completion. The information on performance measurement will be used to create a snapshot of LWIAs’ current policies and practices which will inform efforts to “assess the effectiveness of the current system as it relates to continuous improvement in workforce investment activities” as is set forth in Section 136(a) and to “identify alternative measures that might more effectively accomplish the aims of the performance measurement system”. The information collected from LWIAs will include data on: the policies in place related to performance measures, the influence of performance measures on who to serve and how to serve them, the impact of performance measures on collaboration with different partners, the influence of performance measures on program operations and management, whether local areas have implemented alternative measures as a means to monitor their effectiveness, and their awareness and assessment of Common Measures, which are to be implemented in 2004.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

The questionnaire is intended to be administered by mail. However, an option for local areas to submit electronically, via the web, will also be available for local areas should they choose to complete the survey in this manner. In the cover letter, included as Appendix B, we detail how local areas can obtain an electronic version of the survey by providing the URL link that will enable them to complete the survey via the internet. Based on the contractor's experience with previous surveys, we anticipate approximately 25% of responses will be submitted electronically.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in item 2 above.**

The information being requested is not otherwise available. Although states give some guidance to local areas regarding performance measures, considerable flexibility exists. States can delegate most of the responsibility related to service design and delivery to local areas. The switch from formula-based performance benchmarks under JTPA to negotiated performance goals under WIA, as well as the changes in the specific measures being documented, will undoubtedly impact the ways in which local areas design their performance systems to meet those goals. This means that substantial variation exists in local accountability policies and procedures. Thus, in order to obtain accurate and current information on LWIAs' policies and practices related to performance accountability, it is necessary to obtain this information through the proposed data collection.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

The collection of information does not impact small businesses or other small entities.

**6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles in reducing burden.**

The performance accountability system is at the very core of the Workforce Investment Act because it enables DOL and local areas to document their rates of success along key benchmarks. In order to maintain and improve this system, DOL must be aware of how the current system is impacting policies and services at the local level. In addition, the

information collected in this study will allow DOL to examine alternative measures and policies developed at the local level to determine whether these alternatives provide a more optimal measure of performance or enable local areas to more effectively manage their performance. In making future decisions on performance accountability and measurement, DOL must have relevant and timely information on the differential effects of these factors on local areas. This data collection effort will provide that information.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that would cause this information collection to be conducted in any manner listed above.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

(This will be completed following the posting of the Federal Register Notice and receipt of any comments from this notice).

**9. Explain any decision to provide any payment or gift to respondents, other than reenumeration of contractors or grantees.**

This item is not applicable. No payment or gift to respondents is included.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

Persons to whom the questionnaire is distributed will be assured that their cooperation is entirely voluntary and that their responses will be held in the strictest confidence. Further, they will be assured that no data will be released to the public at-large except in aggregate form. Questionnaire responses will be collected and processed by the contractor for this evaluation, Social Policy Research Associates (SPR). All data items that identify respondents will be kept only by SPR and ETA for use in describing performance measurement policies and practices. Access to any data with identifying information will be limited only to those directly working on the evaluation. Further, any tables or results intended for public release will be carefully screened by senior evaluation staff with expertise in disclosure limitation to ensure that no individual state can be identified.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers these questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

None of the questionnaire items involve sensitive content.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

The total number of respondents for the LWIA survey is 605. The estimate of burden to complete the survey is 1 hour per respondent, or LWIA. Thus, the burden is estimated to be a total of 605 burden hours.

We will pilot test this survey with fewer than ten LWIAs to develop more precise estimates of the actual burden.

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

This request for approval does not cover more than one form.

- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage and rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.**

The estimated cost to LWIA staff for the burden of data collection is \$30,250. This figure was obtained by multiplying the Total Burden Hours for Staff (605 as noted above) by \$50, which serves as an estimate of the average wage of those involved in the effort.

**13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The**

**estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**

The proposed data collection will not require the respondents to purchase equipment or services or to establish new data retrieval mechanisms. Survey content is based on opinion and factual information presumably maintained and available to the respondents. Therefore, the cost to respondents solely involves answering the questions on the survey.

(a) We do not expect any total capital and start-up costs.

(b) We do not expect extensive time spent on generating, maintaining, and disclosing or providing the information.

- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. the cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

We do not expect wide variances in the cost estimates for conducting this data collection.

- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

We do not expect local areas to purchase equipment or services in order to respond to this data collection effort.

**14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.**

The Federal government's costs for this effort are derived from the contractor who will conduct the data collection. To compute these costs, we multiplied the number of hours associated with the task (570) by the average hourly rate of those assigned to the task (\$45). The average hourly rate includes other direct costs. The total estimated cost to the Federal government is thus \$25,650. Additionally, there are some costs associated with the production and distribution of the survey. These costs total \$4,017, which includes \$1,089 for copying the survey, \$639 for envelopes and other mailing materials, \$1,294 for postage, and \$995 for keying responses to the survey.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.**

This one-time request is new and will count as a +605 hours toward ETA's ICB.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and end dates of the collection of information, completion of report, publication dates, and other actions.**

The initial survey will be mailed to LWIA respondents as soon as OMB clearance has been obtained, which is anticipated to be late summer 2003. Results from this data collection will be presented in the final report, to be submitted in March 2004. For a summary of all reports and publications to be completed as part of this evaluation, please see Attachment C.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

We will display or cite, in written correspondence or directives, the OMB approval number and expiration date. This approval number will be prominently displayed on the survey itself.



**18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.**

There are no exceptions to the certification statement.

**B. Collections of Information Employing Statistical Methods**

**1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.**

<u>Universe</u>	<u>Number</u>	<u>Number Surveyed</u>
Local Workforce Areas	605	All 605 LWIAs will be surveyed

We expect to receive a response rate of 80% for the survey, as this is consistent with results from previous data collection efforts of similar nature and magnitude. This data collection has not been previously conducted.

**2. Describe the procedures for the collection of information including:**

- **Statistical methodology for stratification and sample selection,**
- **Estimation procedure,**
- **Degree of accuracy needed for the purpose described in the justification,**
- **Unusual problems requiring specialized sampling procedures, and**
- **Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

The LWIA survey will be administered to all 605 LWIAs. Each of these LWIAs will be mailed a survey and if they do not respond, they will receive a reminder postcard and a second copy of the survey. No sampling will be used for this survey. Because the analysis will primarily make use of frequency distributions and cross-tabulations, there are no complex estimation procedures involved.

a) *Sample Selection.* No statistical methodology will be employed for a sample selection because the survey is being administered to all members of the universe.

b) *Estimation Procedures.* The analysis will primarily make use of frequency distributions and cross-tabulations, which will provide basic information about local areas' decisions and policies concerning the performance measurement system.

c) *Degree of Accuracy.* Because sampling will not be employed, results should be an accurate reflection of the relevant universe, subject to the constraints of reporting error and non-response bias. Basic characteristics of all LWIAs are known from existing sources (e.g., their level of funding, types of persons served, type of administrative structure, location, etc.). These data can be used to suggest whether non-respondents differ in any substantial way from respondents, and to develop weights for respondents in order to adjust for these differences.

d) *Unusual problems.* There are no unusual problems.

e) *Periodic Data Collection.* This survey will be administered once.

**3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.**

In order to maximize response rates and minimize non-responses, ETA's contractor will follow-up with LWIAs that do not return the initial survey in two weeks with a reminder postcard. After waiting an additional one to two weeks, the contractor will mail a second copy of the survey to those whose responses are still outstanding. In each case, the option to complete the survey electronically, as described in the attached cover letter, will be highlighted in order for those local areas that prefer to complete the survey in this manner. If any LWIAs do not respond to the final mailing, the contractor will telephone them directly in an effort to obtain their responses. The survey includes specific open and close-ended questions that are directly related to the intended use of the survey, which is to gather performance measurement and management information. We will not use sampling as part of this effort. All local areas will be surveyed.

**4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of test may be submitted for approval separately or in combination with the main collection of information.**

ETA's contractor will pretest the survey with up to, but no more than, nine respondents. The pretest will assess the clarity of content and wording of the survey, the organization and format of the questionnaire, respondent burden time, and potential sources of response error. The pretest will be used to modify the questionnaire as appropriate.

**5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.**

Name	Affiliation	Telephone Number
Andrew Wiegand	SPR	510.763.1499 x636
<u>&lt;enter here BLS reviewer in final package&gt;</u>		